



STEVEN J. HARFENIST
DIRECT TEL.: 516-355-9630
DIRECT FAX: 516-355-9601
SHARFENIST@HKPLAW.COM

August 22, 2025

VIA ECF

The Honorable Karen M. Williams
United States District Judge
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 4A
Camden, NJ 08101

Re: *Benton, et al., v. Platkin, et al.*
Docket No. 24-cv-7098(KMW)(MJS)

Dear Judge Williams:

Plaintiffs are planning on serving a deposition subpoena on a representative of the New Jersey State Police pursuant to Rule 30(b)(6) on Monday, August 25, 2025. The deposition is tentatively scheduled for September 4, 2025, and will take place remotely.

L.Civ.R. 101.1(c)(4) provides that “[o]nly an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders.” Mr. Stephen Stamboulieh, my co-counsel in this matter, has been admitted *pro hac vice* and requests permission to participate in the deposition on behalf of the Plaintiffs without my presence, as I will be out of the country on the scheduled date. Mr. Stamboulieh was previously granted permission to participate in the hearing on Defendants’ Motions to Dismiss. *See* ECF # 37.

Counsel for Plaintiffs conferred with counsel for Defendant Platkin, who stated that he has no objection to the relief requested.

Respectfully submitted,
HARFENIST KRAUT & PERLSTEIN, LLP

By: *Steven J. Harfenist*
Steven J. Harfenist

cc: All counsel of record (*via* ECF)